

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

CYNTHIA B. SCOTT, et al.,

Plaintiffs,

v.

HAROLD W. CLARKE, et al.,

Defendants.

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Case No. 3:12-cv-36

CONSENT MOTION FOR EXTENSION

Defendants Harold W. Clarke, A. David Robinson, Stephen Herrick, Eric Aldridge, and Dr. Paul Targonski (collectively "Defendants"), by counsel, submit this consent motion requesting an extension of time within which Defendants must respond to Plaintiffs' Motion for Attorney Fees, ECF No. 582. Plaintiffs, by counsel, consent to this motion.

In support of their motion, Defendants state as follows:

1. On June 12, 2019, Plaintiffs filed their Motion for Attorney Fees. ECF No. 582.
2. Pursuant to Western District of Virginia Civil Rule 54(a)(1), Defendants' response to Plaintiffs' motion is due July 3, 2019.
3. The parties request that the deadline for Defendants to respond to Plaintiffs' Motion for Attorney Fees be extended to July 19, 2019 in order to accommodate the schedules of defense counsel and for the parties to explore the potential for a resolution of all claims in dispute between them.
4. Defendants aver that this motion is made in good faith, is not filed for the purpose of delay, and is in the best interests of justice and judicial economy.

5. As such, Defendants respectfully request entry of an Order granting their Consent Motion for Extension, extending the time by which Defendants shall file any opposition to Plaintiffs' Motion for Attorney Fees through and including July 19, 2019, and granting such further relief as the Court deems just and proper.

6. A proposed Order is enclosed.

Respectfully Submitted,

HAROLD W. CLARKE, A. DAVID ROBINSON,
STEPHEN HERRICK, ERIC ALDRIDGE, AND
PAUL TARGONSKI, M.D.

/s/
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*Counsel for Howard W. Clarke, A. David
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and Paul Targonski, M.D.*



CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2019 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will automatically send notification of such filing to all counsel of record.

/s/ _____
Of Counsel

